

A091 (Rev. 8/01) Criminal Complaint

United States Courts
Southern District of Texas
FILED

APR 07 2018

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

V.

Julio Jacob Iglesias

David J. Bradley, Clerk of Court

CRIMINAL COMPLAINT

Case Number: 2:18mj410

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about April 5, 2018 in Brooks County, in the Southern District of Texas defendant, Julio Jacob Iglesias

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324.
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of U.S. Border Patrol Agent

Jaime Trevino

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

April 7, 2018

Date

at 10:35 am

B. Janice Ellington U.S. Magistrate Judge

Name and Title of Judicial Officer

J. Trevino

Signature of Complainant

Jaime Trevino

Printed Name of Complainant

at

Corpus Christi, Texas

City and State

Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

PROBABLE CAUSE / FACTS

On April 5, 2018, Border Patrol Agent (BPA) Vanessa Prado was working her assigned duties at the United States Border Patrol Checkpoint located south of Falfurrias, Texas on Highway 281. At approximately 3:10 p.m., a black 2015 Dodge Durango approached the primary lane for an immigration inspection. As the vehicle came to a stop, BPA Prado noticed two visible occupants in the vehicle. The driver, later identified as Julio Jacob IGLESIAS, looked at the rear view mirror towards the rear of the vehicle then looked at BPA Prado then stared straight ahead at the road in front of him. BPA Prado's experience heightened her awareness as to possible illegal activity due to IGLESIAS' body language. BPA Prado proceeded to ask IGLESIAS and the front seat passenger, later identified as Alberto Alexander ESPERANZA, if they were United States citizens. IGLESIAS responded "Yes" and kept eye contact with BPA Prado. ESPERANZA responded, "Yes" and quickly looked away. BPA Prado walked alongside the vehicle and visibly inspected the rear seat and cargo compartment of the vehicle. BPA Prado noticed that the cargo compartment contained what looked like clothes or bedding sheets, which appeared to have been stacked up high, consistent with a tactic used by alien smugglers to conceal humans.

BPA Prado walked back over to IGLESIAS and asked him about his travel and IGLESIAS stated they were traveling to Kingsville, Texas. BPA Prado asked IGLESIAS who the vehicle who the vehicle belonged to and IGLESIAS stated it belonged to his girlfriend. BPA Prado asked, what was his girlfriend's name was and IGLESIAS looked around as if he was thinking of a name and then blurted out, "Melissa". BPA Prado asked IGLESIAS for consent to search the cargo area of his vehicle and IGLESIAS consented. BPA Prado directed IGLESIAS to the secondary area. BPA's discovered one subject (Uriel NAVARRO-Borja) concealed underneath the clothing and bedding sheets. Both NAVARRO and the front seat passenger (ESPERANZA) were determined to be illegally present in the United States without any documentation that would allow them to remain in the United States legally. All subjects were placed under arrest and processed accordingly.

MIRANDA RIGHTS WARNING:

All subjects were read their Miranda Rights Warning as per service form I-214 in their preferred language. All subjects signed the Miranda Rights Warning form indicating they understood their rights and were willing to make a statement and answer questions without a lawyer present.

PRINCIPAL STATEMENT (Julio Jacob IGLESIAS): video sworn statement

IGLESIAS stated one of his many girlfriends has a friend whose boyfriend asked him to smuggle one illegal alien through the checkpoint. IGLESIAS said his friend picked him up at his house

around 11:00 a.m. and took him to the Stripes Convenience Store on FM 107 in Edinburg, Texas. According to IGLESIAS, this is where he picked up the Dodge Durango and drove it the Falfurrias Checkpoint. IGLESIAS said the illegal alien whom was riding passenger was already seated in the vehicle when he got in. IGLESIAS claims to have no knowledge of the illegal alien concealed underneath the clothes and bedding sheets. IGLESIAS said he was going to get paid \$200.00 to take the vehicle to Falfurrias and was going to leave the vehicle somewhere. IGLESIAS would not provide specifics on his alien smuggling facilitator, but did acknowledge knowing it was illegal to smuggle aliens.

NOTE: The Dodge Durango was driven to the checkpoint without a key in the ignition.

MATERIAL WITNESS STATEMENT: Alberto Alexander ESPERANZA

Documented on service Form 215, ESPERANZA stated he illegally crossed into the United States four days ago. ESPERANZA said he crossed alone and walked the entire time. ESPERANZA claims he was lost when he eventually reached the convenience store where he was picked up by the driver (IGLESIAS). ESPERANZA claims a random person at the store gave him the clothes he is wearing. ESPERANZA denies any knowledge regarding the other illegal alien concealed in the rear area of the vehicle. ESPERANZA was shown a photo lineup containing the driver's photo, he pointed the driver out but would not initial by his photo.

MATERIAL WITNESS STATEMENT: Uriel NAVARRO-Borja

Documented on service Form 215, NAVARRO stated he illegally crossed into the United States three days ago. NAVARRO crossed with one other individual whom was his guide. NAVARRO described his guide as being Mexican, heavy set and dark skinned. NAVARRO said his guide went by the name, "Rosendo." NAVARRO paid Rosendo \$5,000.00 Mexican Pesos. Rosendo took NAVARRO to an unknown shack or shed, where he stayed for three days. NAVARRO said Rosendo was the caretaker and was the individual who picked him up on today's date. NAVARRO said Rosendo picked him up in the vehicle he was arrested in. NAVARRO also said Rosendo placed him in the rear area compartment of the Durango and placed the clothes on top of him. Rosendo drove for about 20 minutes then they stopped, this is when NAVARRO heard people talking in English, they were stopped for about 5 minutes and the vehicle drove again for almost 2 hours. After that time, NAVARRO said he was arrested at the checkpoint. NAVARRO was not able to identify the driver in a photo lineup.

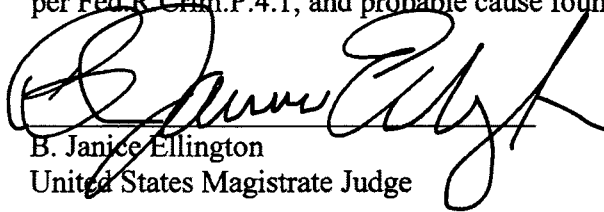
DISPOSITION:

The facts of this case were presented to Assistant United States Attorney Amanda Gould who accepted Julio Jacob IGLESIAS for prosecution of 8 USC 1324, Alien Smuggling. Alberto Alexander ESPERANZA and Uriel NAVARRO-Borja will be held as a material witness in this case.



Jaime Trevino
Border Patrol Agent

Submitted by reliable electronic means,
sworn to, signature attested telephonically
per Fed.R.Crim.P.4.1, and probable cause found:



B. Janice Ellington
United States Magistrate Judge